

Plaintiff Securities and Exchange Commission, pursuant to the Magistrate Judge's Order of January 27, 2016 (ECF No. 164), hereby moves the Magistrate for an Order compelling Defendant Verdmont Capital, S.A. to produce certain outstanding documents and other materials in response to the Commission's first and second requests for production, together with such other and further relief as the Magistrate deems just and proper. The bases for the Commission's

Motion are set forth in the companion Memorandum of Law, which is being filed contemporaneously herewith.

Dated: Washington, D.C.
February 12, 2016

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on February 12, 2016, I electronically filed the foregoing NOTICE OF MOTION TO COMPEL PRODUCTION FROM DEFENDANT VERDMONT CAPITAL, S.A. using the CM/ECF system, which will send notification of such filing to counsel for Defendants Caledonian Bank Ltd., Caledonian Securities Ltd. and Verdmont Capital, S.A. at the following addresses:

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